

Re: Fw: Queen Acres WRF - Site-specific Copper Criteria (WER) Study Plan

Thomas Poleck

to:

David Pfeifer

02/18/2011 06:08 PM

Show Details

Dave, I looked through this again and have a couple of possible comments. I said "possible" since I'm not an expert on all the WER guidance and techniques and the latitude that might be permissible in designing these studies. If you think any of these are possibly important I suppose we could get some backup from others (like Chuck Stephan or Charlie Delos?) or pass them back to Chris for him to consider further as part of his review.

First, I didn't notice any range finding tasks in the study plan. Typically this would be done, but I'm assuming in this case the toxic ranges are so well known with these species that there was no need. If that is the case, the study plan should probably at least mention that this is the case.

The actual sampling sites are not specifically identified in Section IV.A.3.a. Again, maybe this is a judgment call and given the relative simplicity of the site not all that necessary. Also, the sampling schedule plan is to collect three times separated by at least three weeks. This may meet minimum requirements, but ideally it would be better

to extend these time periods to better account for seasonal and flow differences.

The choice of *C. dubia* and *P. promelas* make sense especially from a testing perspective unless they are both very insensitive (I don't know) in which case a more sensitive indigenous species would make more sense to

use. Also, the 1994 guidance recommends that one of the two tests be a sub-chronic test and the two proposed are both short-term acute tests. The guidance also recommends possibly doing a third species if the calculated WERs are substantially different. This is not presented as an option in the study plan. Again, where I'm a little uncertain is if these items are actual short-comings of the study plan or would be better thought of as enhancements. Overall I think the study plan is thorough and well described and the lab has all the appropriate SOPs and needed expertise.

Although my thought is that implementing this plan will yield the data necessary to calculate adequate WERs, the items I mentioned above should probably be considered or investigated just to ensure that any of these issues could bring the obtained data into question.

Tom

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-----David Pfeifer/R5/USEPA/US wrote: -----

To: Thomas Poleck/R5/USEPA/US@EPA
From: David Pfeifer/R5/USEPA/US
Date: 02/17/2011 03:54PM
Subject: Fw: Queen Acres WRF - Site-specific Copper Criteria (WER) Study Plan

The contract lab is GLEC. Given your experience with GLEC, any suggestions/recommendations?

David Pfeifer
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----- Forwarded by David Pfeifer/R5/USEPA/US on 02/17/2011 03:53 PM ---
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From:
"Chris Skalski" <Chris.Skalski@epa.state.oh.us>
To:
David Pfeifer/R5/USEPA/US@EPA
Date:
01/19/2011 12:13 PM
Subject:
Queen Acres WRF - Site-specific Copper Criteria (WER) Study Plan

Dave - Re-sending this message as I had not yet heard back. Butler County would like to commence their study early in the spring of this year. Thanks.

Hi Dave,

I'm passing along the attached request for a site-specific criteria we

recently received to you in the hope that someone at Region V can assist in reviewing the attached study plan. We are interested in knowing if there are any issues, revisions, comments, etc that should be passed along to the applicant from Region V's perspective before they implement the plan of study.

Ohio EPA recently completed a survey of the receiving stream, which included sites bracketing the applicant's discharge, back in 2005. This TSD is available at:
<http://epa.ohio.gov/portals/35/documents/FourmileIndianTSD2008.pdf> .

I've also included a few maps (attached power point) showing facility location, receiving stream, etc.

Finally, the current NPDES discharge permit can be viewed at this web link: <http://wwwapp.epa.ohio.gov/dsw/permits/doc/1PG00043.pdf>

Thanks for your help,

Chris

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>>> Eric Nygaard 12/27/2010 9:08 AM >>>
Chris - Here is another WER study. The Queen Acres WWTP discharges to Indian Creek to the GMR.

>>> Ned Sarle 12/23/2010 9:45 AM >>>
Eric:

I have received the following study plan from Butler County addressing copper at their Queen Acres WWTP. I also have received the hard copies of these reports. Who should be reviewing this plan? The county is hopeful of starting this study in early spring. So, if we have any comments on this study, it would be a good idea to provide them as soon as possible.

Thank you for your help on this question. Hope you have a Merry Christmas....Ned

>>> "Adam Sackenheim" <sackenheima@butlercountyohio.org> 12/16/2010 1:45 PM >>>
Good afternoon Ned. Hope all is well.

Please find attached Water Effect Ratio Study Plan for Copper at Queen Acres WRF. Two hard-copies will be sent out tomorrow to your attention. Please let us know if you have any comments or questions. Much thanks.

Adam M. Sackenheim
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>>> "Ned Sarle" <Ned.Sarle@epa.state.oh.us> 10/22/2010 11:30 AM >>>
Thanks for the update...Ned

Ned Sarle
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>>> "Adam Sackenheim" <sackenheim@butlercountyohio.org> 10/22/2010 10:11 AM >>>
Good morning Ned.

I just wanted to let you know that BCWS has decided to move forward with developing a Water Effects Ratio study plan for copper at Queen Acres. By the end of the year we intend to submit our study plan to Ohio EPA for review. Barring any hold-ups, we intend to complete all WER sampling and analysis events in the 2011 calendar year.

Let me know if you have any questions.

Sincerely,

Adam M. Sackenheim
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[attachment "QA WER Study Plan 2010.PDF" deleted by Thomas
Poleck/R5/USEPA/US] [attachment "WER cover letter 12-2010.PDF" deleted by
Thomas Poleck/R5/USEPA/US] [attachment "Queen Acres Maps.PPT" deleted by
Thomas Poleck/R5/USEPA/US]